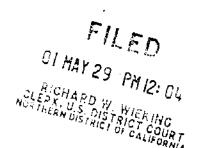
ROBERT S. MUELLER, III (CSBN 59775) 1 United States Attorney 2 Attorney for Plaintiff 3



UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

VIOLATIONS: Title 18 U.S.C. §§ 1343 and 2 - Wire Fraud; Aiding and Abetting.

v. WILLIAM ARNOLD MUNIZ,

Defendant.

INDICTMENT

The Grand Jury charges:

COUNTS ONE THROUGH ELEVEN:

(18 U.S.C. §§ 1343 and $\overline{2}$ – Wire Fraud; Aiding and Abetting.)

1. Beginning in November 2000, and continuing to in or about February 2001, in the

Northern District of California, and elsewhere, the defendant

WILLIAM ARNOLD MUNIZ

devised a scheme and artifice to defraud and to obtain money and property by means of false and fraudulent pretenses, representations and promises.

2. It was part of the scheme to defraud that defendant MUNIZ read out of state newspapers

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in order to find advertisements for lost pets or lost jewelry having sentimental value.

- 3. It was further part of the scheme that defendant MUNIZ contacted the people who placed the advertisements for lost pets or jewelry and falsely represented that he had recovered their pets or jewelry, when in fact, he had not.
- 4. It was further part of the scheme to defraud that defendant MUNIZ fabricated stories to tell pet owners regarding the circumstances under which he had allegedly found their pets.

 For example, MUNIZ told some pet owners that he and his wife were from Canada, had been touring the United States, and had been traveling in the vicinity of the pet owners' homes at or about the time the pets were lost. MUNIZ also claimed that he and his wife had rescued the pets after they had been hit by a car, beaten by a stranger, or suffered some other type of physical trauma. MUNIZ falsely claimed that he and his wife had cared for the pets since rescuing them, and that his wife had become emotionally attached to the pets. MUNIZ also told pet owners that he was willing to return the pets if their owners would reimburse him for transportation costs and other expenses such as veterinary bills.
- 5. It was further part of the scheme that MUNIZ fabricated stories to tell owners of lost jewelry regarding the circumstances under which he had allegedly acquired their jewelry. For example, MUNIZ told some victims that he had been visiting their area at or about the time that the jewelry was lost and had purchased the jewelry from an unidentified person. MUNIZ further claimed that he would be willing to return the jewelry if the owners would pay him the amount he had spent to acquire the jewelry.
- 6. It was further part of the scheme that MUNIZ caused the owners of lost pets and jewelry to wire transfer money to him through Western Union.
- 7. For the purpose of executing the aforementioned scheme and artifice to defraud, the defendant WILLIAM ARNOLD MUNIZ knowingly caused pet and jewelry owners to transmit by means of wire communication in interstate and foreign commerce, namely, wire transfers of funds as follows:

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1	COUNT	DATE	DESCRIPTION OF WIRE	DESCRIPTION OF PET/JEWELRY
2	One	11/13/00	\$172 from Denver, Colorado to	Black and White Cat
3			Western Union in San Francisco, California in the	Diack and White Car
4			name William Arnold Muniz	
5	Two	11/28/00	\$1517 from Mascotte, Florida to	Dog
6	1 W O	11/20/00	Western Union in San Francisco, California in the	246
7			name of William Arnold Muniz	
8	Three	11/30/00	\$644 from Tualatin, Oregon to Western Union in San Francisco, California in the	Black Cat
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10			name of William Arnold Muniz	
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12	Four	12/04/00	\$1000 from Tempe, Arizona to Western Union in Daly City,	Border Collie/Shelty Mix
13			California in the name of William Arnold Muniz	
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15	Five	12/06/00	\$325 from Phoenix, Arizona to Western Union in Daly City,	Great Dane Puppy
16			California in the name of William Arnold Muniz	
17				Antique Diamond Ring
18	Six	12/11/00	\$900 from Clackamas, Oregon to Western Union in San Bruno,	
19			California in the name of William Arnold Muniz	
20			#000 C P 4 1 0	Yellow Labrador Retriever
21	Seven	12/20/00	\$900 from Portland, Oregon to Western Union in San Francisco, California in the	
22			name of William Arnold Muniz	
23	Eight	1/04/01	\$260 from Bloomfield, New Mexico to Western Union in San Francisco, California in the name of William Arnold Muniz	Brown Pit Bull
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1	Nine	1/05/01	\$210 from Jackson, Mississippi to Western Union in San	Orange Sable Pomeranian				
2			Francisco, California in the name of William Arnold Muniz					
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4	Ten	1/05/01	\$1000 from Richmond, Virginia to Western Union in San	Blue Basset Hound				
5 6			Francisco, California in the name of William Arnold Muniz					
7	Eleven	2/11/01	\$900 from Makawao, Hawaii to	Two Antique Gold Rings				
8	Eleven	2/11/01	Western Union in Richmond, California in the name of J.P. Whittenburg					
9			wmuenomg					
10								
11								
12	All in violation of Title 18, United States Code, Section 1343 and 2.							
13	All in violation of Title 18, Officed States Code, Section 1343 and 2.							
14	DATED.		Δη	TRUE BILL.				
15								
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17	ROBERT S. MUELLER, III United States Attorney							
18								
19	Jul Taldwell							
20	DAVID W. SHAPIRO Chief, Criminal Division							
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22	(Approved as to form: (ADSA HOWDEN) AUSA HOWDEN							
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